

From: [Kurpius, Meredith](#)
To: [Judge, Robert](#)
Cc: [Lakin, Matt](#); [Clover, Fletcher](#); [Felix, Elfego](#); [Flagg, MichaelA](#); [Hoag, Katherine](#); [Vallano, Dena](#); [YOSHIMURA, GWEN](#)
Subject: RE: AMP600 data certification report for CARB, as of 5/7/13
Date: Thursday, May 09, 2013 8:05:10 AM

Bob,

How about if AQS recommends N and the State does nothing other than initialize the certification report? We would also like to see this go to S.

I also like your three columns and the Y definition below. I still find the headers confusing but as long as there is a definition that we can point to then it is workable. The source of confusion is with the term “concurrency” since that has to do with agreeing. The definition of Y below has nothing to do with agreeing – it has to do with data quality. We could put a Y in the concurrency field for data that has a N for AQS rec and S/L rec – thus we would be disagreeing! Seems funky but maybe it’s the best we can do at this point without separate certification and data quality fields.

-Meredith

From: Judge, Robert
Sent: Wednesday, May 08, 2013 1:03 PM
To: Kurpius, Meredith
Cc: Lakin, Matt; Clover, Fletcher; Felix, Elfego; Flagg, MichaelA; Hoag, Katherine; Vallano, Dena; YOSHIMURA, GWEN
Subject: RE: AMP600 data certification report for CARB, as of 5/7/13

The self propagating will be fixed- before anything goes to “N.” It should go to “S”.

If AQS recommends N, and State or (C.A. (Certifying Agency)) recommends Y; or if AQS recommends Y and the State (C.A.) recommends N; then EPA should be making a decision—and “S” should be inserted

(My gut is that if both say “Y” —then propagating to “Y” probably wouldn’t be a problem—though the Region may want to override and should have ability to do so..)

I’m glad the headers are improved.. and I agree with your confusion on “EPA concurrence” column. When I originally shared some of my thoughts with Mike—based on our discussions- my thought was for the last 3 columns...

Concurrency Flag

AQS	C.A.	EPA
recommended	recommended	

In my view, then the previous definition we put out there would apply to what we mean when we put a value in the EPA column.. (the name certification would need to change here as well.) Would this work better?

(Again- I think “cert” field AQS needs to be renamed—and perhaps- new one added (ie, did the State submit the required letter under 40 CFR 58.15?))

Possible Values of Certification Flag

Flag Value	Applicable Situation
Blank	Certification is not required by 40 CFR 58.15 and no conditions apply to be the basis for assigning another flag value
U	Uncertified. The state did not submit a required certification letter and summary reports for this monitor even though the due date has passed, or the state's certification letter specifically did not apply the certification to this monitor.
S	The certifying agency has submitted the certification letter and required summary reports. A value of "S" conveys no Regional assessment regarding data quality per se. This flag will remain until the Region provides an "N" or "Y" concurrence flag.
N	The certifying agency has submitted the certification letter and required summary reports, but EPA has determined that issues regarding the quality of the ambient concentration data cannot be resolved due to data completeness, the lack of performed quality assurance checks or the results of uncertainty statistics shown in the AMP255 report or the certification and quality assurance report.
Y	The state has submitted a certification letter, and EPA has no unresolved reservations about data quality (after reviewing the letter, the attached summary reports, the amount of quality assurance data submitted to AQS, the quality statistics, and the highest reported concentrations).
M	The certifying agency has revised data from this monitor since the most recent certification letter received from the state.

From: Kurpius, Meredith
Sent: Wednesday, May 08, 2013 3:24 PM
To: Judge, Robert
Cc: Lakin, Matt; Clover, Fletcher; Felix, Elfego; Flagg, MichaelA; Hoag, Katherine; Vallano, Dena; YOSHIMURA, GWEN
Subject: RE: AMP600 data certification report for CARB, as of 5/7/13

Bob,

So is the self-propagating N a technical issue that is just awaiting some re-coding or is there some policy issue to resolve?

New names are much appreciated! On a side note, what do you think it means if a S/L/T has an N for "Cert. Agency Recommended Flag" and then EPA puts in Y in the "EPA Concurrence" field? Are we concurring with the N? Or are we concurring that data are certified? Or are we asserting that data are valid? If it's the middle option, that seems meaningless since data are officially certified once the S/L/T submits the certification package to us. If it's one of the last option then the header/answer combo is not clear. Lew asked us to put Y's in for Bay Area AQMD airport Pb but since the agency certified data early using the old system, there is nothing in AQS for EPA to concur with so what would a Y in the EPA concurrence field mean? It seems to me that the lack of a certifying agency recommendation of Y (so either blank or N) should not be coupled with a Y for EPA concurrence. Maybe the only way to really fix this is to have two separate fields, as you have suggested: one for certification and the other for some QA indicator based on AMP600. In the short term, some official definition of "EPA Concurrence" and how it's expected to be used would be helpful (e.g., should we be putting a Y if the S/L/T has an N and what does that actually mean?).

It would also be helpful to put some parameters on the converse situation: what does it mean if the S/L/T puts a Y and EPA puts N in the concurrence field? That case is easier for me to imagine but there could be wildly different criteria applied by each Region.

More fodder for our call next week, unless you have some insight in the meantime.

-Meredith

From: Judge, Robert
Sent: Wednesday, May 08, 2013 10:29 AM
To: Kurpius, Meredith
Cc: Lakin, Matt; Clover, Fletcher; Felix, Elfego; Flagg, MichaelA; Hoag, Katherine; Vallano, Dena; YOSHIMURA, GWEN
Subject: RE: AMP600 data certification report for CARB, as of 5/7/13

Thanks- Duly noted. I've reattached a report for CA that I just ran- with a newly labeled columns (so it does not suggest that data are not certified). I know Mike/ Robert are working on making sure "N"'s don't get propagated. (I skimmed through this—for some reason South Coast PM10 was recommended Y- but the State put in N- and thus it got propagated.... Odd)

(I've removed CARB from distribution list..)

From: Kurpius, Meredith
Sent: Wednesday, May 08, 2013 1:11 PM
To: Judge, Robert
Cc: Lakin, Matt; Clover, Fletcher; Gayle Sweigert; Felix, Elfego; Flagg, MichaelA; Hoag, Katherine; Vallano, Dena; YOSHIMURA, GWEN
Subject: FW: AMP600 data certification report for CARB, as of 5/7/13

Bob,

Just wanted to share the CARB PQAO AMP600. Note ~140 N's that would need to be justified. At this point at least 3 staff at CARB have been working almost exclusively on data certification for a month (360 hours) and they expect to need more staff (roping in the QA folks) for the next 1.5-2 weeks. It has delayed all the other important work that CARB needs to be doing including the ANP and PM2.5 metadata – both of which will now be late. I just wanted to share the real-life implication of the new certification process and in particular the automatic propagating N's. I have cc'd Gayle Swiebert at CARB in case she has any additional experiences to share.

-Meredith

From: Clover, Fletcher
Sent: Tuesday, May 07, 2013 2:19 PM
To: Kurpius, Meredith; Flagg, MichaelA; YOSHIMURA, GWEN; Felix, Elfego; Hoag, Katherine; Vallano, Dena; CHANG, RANDALL
Cc: Lakin, Matt
Subject: AMP600 data certification report for CARB, as of 5/7/13

All,

Attached are the 2012 results for CARB – look upon and despair! (Just kidding.)

Also, after taking a look, I realized my initial assessment of 2,000+ records is wildly high. It's more likely in the high hundreds, since this year the scope only calls for criteria pollutant monitors.

Thanks,

Fletcher

Fletcher Clover
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